

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

NGBO BONNY E-HOME CO.,
LTD.

Case No. 2:24-cv-00568

RESPONSE

Plaintiff,

v.

ONDWAY, POOLCLEAN US
STORE, USA WAREHOUSE,
WANJIE, INPOOL US STORE,
DEWFOND, DIGIGER,
OTOBUDDY STORE, and et al.
Individual, Partnerships
Defendants.

RESPONSE TO REQUEST IN ORDER ECH 19

This Court has ordered in ECH 19 dated May 12, 2025, that Plaintiff's counsel shall file with the Court an affidavit indicating whether Plaintiff has brought any suit in this or any other Court against any Defendant in this case based on the patent at issue, regardless of whether said Defendant was dismissed. Plaintiff's Counsel hereby responds:

1. Below is a Declaration by Plaintiff's Counsel stating that Plaintiff has not brought any suit in this or any Court based on the patent at issue.
2. Counsel apologizes that this RESPONSE TO REQUEST IN ECH 19 is being filed later than the Court had requested. The delay in response was inadvertent.

Dated: May 21, 2025,

By: /s/ Patricia Ray

Attorney for Plaintiff

DECLARATION OF PATRICIA RAY CONCERNING RESPONSE TO
COURT REQUEST

I am Patricia Ray submitting this Declaration on behalf of Plaintiff as requested by the Court in ECH 19:

1. I, Patricia Ray, am over the age of 18 and am making this declaration concerning facts within my knowledge and to which I can testify if asked.
2. I am a Pennsylvania attorney registered as Bar No. 31989 since 1980. I represent the Plaintiff in this case.
3. I have not filed and am not aware of any other legal actions that have been filed on behalf of Plaintiff based on issues related to the patent in issue.
4. I make these statements to the best of my knowledge concerning known facts and under the threat of perjury for false statements.

Dated: May 21, 2025,

By /s/ Patricia Ray